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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

FEB 27 1987

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Packaging (and Registration) of Home-Use Products Con-

taining Brodifacoum

T0:

Bill Jacobs. Ph.D.

IRB/TSS

FROM:

Byron T. Backus Byron Tiel 87
Toxicologist
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Toxicology Branch, HED (TS-769C)

THROUGH: Marcia van Gemert, Ph.D.

Section Head, Section III

Toxicology Branch, HED (TS-769C)

and

Theodore Farber, Ph.D.

Chief, Toxicology Branch Hazard Evaluation Division, HED (TS-769)

.Chemical no. 114AAA

Project No. 7-0404

Record No. 189660

Action Requested:

The Toxicology Branch has been requested to review, on an expedited basis, what appears to be an industry evaluation of products containing Brodifacoum in "tamper-resistant" packaging proposed for general home-use.

These products would contain 20 gram wax blocks with 50 ppm (0.005%) of Brodifacoum. Extrapolating from the 0.25 mg/kg rat male oral LD50 value for the technical a formulation with this percentage of active would have an LD50 of 5 g/kg. Since these wax blocks are in several types of retaining packages, calculations are made as to how much wax block could slip out of each type of package if the blocks were gnawed down to an appropriate configuration. Values are then presented (table 4) as to "hazards" to 14 and 25 kg children, as well as to 5 and 20 kg dogs.